

6 morning, and in connection with that, you identified a  
7 series of problems associated with each of the various  
8 stages.

9 I guess there wasn't anything, that you are  
10 aware of, in connection with the billing, but otherwise,  
11 for the other four stages you associate -- you identified  
12 problems associated with that area, correct?

13 A. Right.

14 Q. Are one or more of these -- let me back up.

15 Have you heard of a problem referred to as a  
16 backlog?

17 A. Yes.

18 Q. And what do you understand the backlog of resale  
19 orders to be?

20 A. Do you want me to describe the backlog?

21 Q. Yeah, what do you understand it to be?

22 A. Essentially, it is a backlog of various  
23 functions within the LISC, in terms of process requests,  
24 FOC's, completions, et cetera.

25 Q. So in your mind, it can refer to any stage, any  
0070  
1 stage along various stages of the resale order process?

2 A. Yes.

3 Q. And at some point, did you become aware that a  
4 backlog had developed at the LISC?

5 A. Yes, the first time.

6 Q. And when was the first time?

7 A. Back in '96, late '96. It was right around the

8 holidays, so December '96.

9 Q. You hadn't heard about it in October or  
10 November?

11 A. No.

12 Q. What did you understand the backlog to be when  
13 you first heard about it? Was it a delay in FOC's being  
14 issued, was it a delay in completion notices, was it a  
15 variety of things?

16 A. A variety.

17 Q. So that would be a delay in completion notices  
18 and a delay in FOC's. Is that principally the two  
19 elements of the backlog?

20 A. Yes, also including a backlog in terms of order  
21 processing.

22 Q. And by that, do you mean that the orders  
23 wouldn't be processed within some interval that was  
24 expected initially?

25 A. Yes, primarily because of the volume that had  
0071  
1 come in unexpectedly to the LISC, and resulting then in a  
2 backlog.

3 Q. Do I have an understanding that it was expected  
4 that a properly submitted resale order would be processed  
5 in, and an end user would be migrated within three days of  
6 receipt of the order at the LISC?

7 A. Yes.

8 Q. Is one element of the backlog that that was not  
9 occurring?

10 A. No. Migrations were actually taking place

11 within the three-day interval. It was all the ancillary  
12 functions associated with the request that were largely  
13 backlogged.

14 Q. So by that, do you mean that the CLC might not  
15 receive the FOC within four hours?

16 A. Correct.

17 Q. Or a completion notice might not be received  
18 within a day or so of the order being completed?

19 A. Correct.

20 Q. But the order actually was processed within the  
21 three days?

22 A. Yes.

23 Q. Do you know over what period of time that  
24 situation occurred?

25 A. That particular one was over a period of  
0072

1 about -- it was less than two weeks.

2 Q. And that was in December of 1996?

3 A. Yeah, uhm-hum.

4 Q. Your answer is yes?

5 A. Yes.

6 Q. Are you aware of some steps that were taken to  
7 alleviate that backlog?

8 A. Yes.

9 Q. And what do you understand occurred?

10 A. We, essentially, pulled in resources into the  
11 LISC to process the backlog. We worked the LISC on an  
12 overtime basis. In addition, we pulled in resources in

13 other areas of industry market who deal with carriers and  
14 carrier services to, essentially, beef up the staffing,  
15 again, on an overtime basis. So we literally worked 24  
16 hours a day and got the backlog cleaned up in -- it was  
17 two or three days.

18 Q. And that was in December of '96?

19 A. (No audible response).

20 Q. Your answer is yes, again?

21 A. Yes, sorry.

22 Q. Subsequent to that occurrence, are you aware of  
23 a backlog existing thereafter?

24 A. Recently, yes.

25 Q. What do you mean by recently?  
0073

1 A. I'd say this month, April.

2 Q. What's your understanding of the backlog in  
3 April?

4 A. My understanding is that it's, essentially, the  
5 same types of things. It's a variety of what we call work  
6 items, orders that need to be processed, FOC's  
7 completions, et cetera. I don't know what volume is  
8 associated with the backlog.

9 Q. Is the backlog this morning, that you are aware  
10 of, similar to what you talked about in terms of December,  
11 meaning, it's not a delay in the processing of the  
12 order -- the delay is not in the actual migration within  
13 three days of receipt of the order, but rather there  
14 simply is delay in the response to the CLC, whether it's  
15 the FOC and/or the completion notice?

16 A. Quite frankly, I am not sure if it is exactly  
17 the same situation as last December.

18 Q. Are you aware that some orders come in and then  
19 are not processed within three days -- I will say orders  
20 that are properly completed, there are no errors in them?

21 MR. KOLTO-WININGER: Do you mean as of today or  
22 do you mean any time?

23 MR. McDONALD: Q. During the month of April.

24 A. I am aware that there is a backlog of, again,  
25 these different work items within the LISC, but I don't  
0074

1 have any detailed information as to how that is impacting  
2 the provisioning interval associated with migrations or  
3 the other activities.

4 Q. Were you made aware at any time between, say,  
5 December and this date that migration did not occur on a  
6 regular basis for orders that were submitted -- migrations  
7 did not occur within three days for orders submitted to  
8 the LISC?

9 A. No, I am not aware.

10 Q. And if you were to learn that that was the case,  
11 do you think that that is something that you, as a person  
12 in charge of processes at the LISC, would attempt to do  
13 something about?

14 A. No, it would not fall within the scope of my  
15 responsibilities. The business process is, essentially,  
16 the business process and has been developed and has been  
17 implemented so issues around backlog and those types of

18 things wouldn't fall within that -- within that

19 responsibility of process development.

20 Q. Is it possible that in order to alleviate a

21 backlog a decision might be made to add staff? Is that

22 one way to resolve the backlog?

23 A. Yes.

24 Q. Might another solution be to enhance some

25 systems?

0075

1 A. Yes.

2 Q. And if staff were -- or if systems were altered,

3 does that not require, at least in some instances, that

4 processes be changed?

5 A. In the case of systems, yes; in the case of

6 increasing staff, no.

7 Q. Your testimony is, if the systems changed, there

8 may be a need to change processes; is that right?

9 A. Yes.

10 Q. Simply adding staff generally would not require

11 changing processes?

12 A. True.

13 Q. Are you involved currently in any regular -- do

14 you regularly meet with Mr. Torretta and/or Mr. Hough or

15 anyone else responsible for staffing at the LISC?

16 A. Not on issues of staffing.

17 Q. How about just -- let's back up.

18 In early 1995, you were involved in the planning

19 for the LISC. At some point, would you say that the

20 planning phase evolved into an operational phase?

21 A. Yes.

22 Q. And can you just sort of generally draw a line

23 somewhere in time?

24 A. Generally speaking, I would say approximately

25 sometime during the third quarter of '95, it started to  
0076

1 transition into an operational phase.

2 Q. And do you continue to be in an operational

3 phase currently?

4 A. Yes.

5 Q. Now, in the planning stage, did you regularly

6 meet with Mr. Torretta?

7 A. Yes.

8 Q. And with anyone else to work on the planning for

9 the LISC?

10 A. Ann Long. I am trying to think back that far as

11 to who was involved with that aspect of it. Members of my

12 team, certainly.

13 Q. Did you meet with Mr. Hough on any regular

14 basis?

15 A. Not on a regular basis, in terms of, you know,

16 scheduled meetings on a regular basis.

17 Q. Did you have scheduled meetings with

18 Mr. Torretta?

19 A. With members of his team, yes.

20 Q. How often were those meetings, say, in the early

21 days? Were they weekly meetings, monthly meetings?

22 A. I'd say they probably averaged weekly.

23 Q. Did that continue for the entire period through  
24 '95, through your transition into this operational phase?

25 A. Yeah, pretty much.

0077

1 Q. And then, when the LISC became operational, did  
2 the frequency of meetings with the systems people change?

3 A. Well, with me personally, yes, because I picked  
4 up additional staff. And so they picked up some of those  
5 functions of meeting with project teams on a regular  
6 basis, for various aspects of the systems development  
7 effort in conjunction with their responsibilities.

8 Q. So then, what happened over time is people in  
9 Mr. Torretta's staff meet with people in your staff?

10 A. Yes.

11 Q. With what frequency did that occur?

12 A. Different members of my staff and different  
13 members of Greg's staff probably meet on an almost daily  
14 basis.

15 Q. How about you personally meeting with  
16 Mr. Torretta? Is there any plan, has there been any  
17 system of meetings, you know, regular meetings, monthly?

18 A. We had, at various times, regularly scheduled  
19 conference calls, we had regularly scheduled meetings,  
20 again, depending on the development effort that was  
21 ongoing at that point in time.

22 Q. Among the things that you discussed, that you or  
23 your people discussed with the systems people, were ways  
24 to enhance the operations of the LISC; is that fair?

25 A. Yes.



0078

1 Q. Were there other top particulars that were  
2 discussed, I mean, your responsibility was resale  
3 processes?

4 A. Resale processes development priorities.

5 Q. Can you explain what you mean by that?

6 A. What should we do first in terms of both, you  
7 know -- again, going back into '95, in terms of both  
8 process development and systems development, prioritizing  
9 those efforts, given the scope and magnitude of the  
10 efforts.

11 Q. I was trying to talk about during the  
12 operational phase. I was trying to figure out if there  
13 was -- when the LISC has become operational, in  
14 particular, we are getting into, say, late '96, and there  
15 are problems that are developing.

16 Was there some kind of procedure or system in  
17 place, where the people who are involved in the management  
18 of the LISC or devising the processes and the systems  
19 determining the number of personnel, regularly met to  
20 assess the LISC's success and what, if any, changes should  
21 be made?

22 A. I know that they did, but again, given the scope  
23 of my responsibilities and my work with Torretta, we were  
24 working on things like business requirements for systems,  
25 M&P, or Methods and Procedures for systems, looking at  
0079

1 existing processes, looking at national forums and what  
2 was being developed there.

3        So what I was looking at and what the management  
4 team of the LISC was looking at, in terms of their  
5 priorities, could be two different things. Mine tends to  
6 be more strategic and kind of forward looking and theirs  
7 tend to be the management of the day-to-day issues.

8        Q. If, on a day-to-day basis, say, a backlog at the  
9 LISC developed earlier this year, you wouldn't necessarily  
10 be apprised of that?

11      A. Right.

12      Q. Who would make the decision as to what you would  
13 be informed about and not be informed about?

14      MR. KOLTO-WININGER: Objection. Vague; calls  
15 for speculation, but go ahead.

16      THE WITNESS: My counterpart in the LISC.

17      MR. McDONALD: Q. Who is that?

18      A. Don Griffin.

19      Q. So it would be up to Mr. Griffin to determine,  
20 if there is a problem that's identified, whether this  
21 would be something for which a process person could  
22 provide some assistance, then it might be referred to you  
23 or people in your group?

24      A. Right.

25      Q. And if Mr. Griffin determined that this is a  
0080  
1 system or personnel problem that they -- they may not ever  
2 bring the issue to you?

3        A. Correct.

4        Q. Now, going back to the planning phase, so I  
5 guess, given the time sort of frame that you have given,

6 we will talk early '95 to October of '95 or so; is that

7 right?

8 A. Approximately third quarter, thereabouts.

9 Q. My understanding is, there was this group of

10 three of you, Mr. Torretta, you, and Mr. Hough, who had

11 responsibility for planning the various elements of the

12 LISC; is that fair?

13 A. Yes.

14 Q. And did the three of you report to some

15 individual or team of superiors?

16 A. Yeah, I mean, our direct managers were not the

17 same people.

18 Q. Right.

19 A. But we are all in the industry markets group

20 organization.

21 Q. Did Jerry Sinn -- you know Mr. Sinn, right?

22 A. Yeah.

23 Q. Did he have ultimate responsibility for making

24 the decisions about processes or systems or personnel that

25 the three of you were involved in planning?

0081

1 A. No. I don't think it rested solely on Jerry

2 Sinn's shoulders.

3 Q. Who do you think had the responsibility?

4 A. I think there were a lot of people that were

5 involved; certainly, you know, my supervising manager, my

6 executive director, and Greg's. I mean, I don't know that

7 it rested on any one person's shoulders as to these

8 efforts. I mean, it's the combined effort of the  
9 different organizations providing input and subject matter  
10 expertise into the leadership team.

11 Q. Well, in your chain of command, who ultimately  
12 would make the decision for processes?

13 A. In terms of process development?

14 Q. Right.

15 A. In terms of what gets developed?

16 Q. Right.

17 A. That would ultimately be myself and the product  
18 organization with input from the LISC organization.

19 MR. KOLTO-WININGER: Off the record.

20 (Discussion off the record.)

21 MR. McDONALD: Q. Did you finish that answer?

22 MR. KOLTO-WININGER: Sorry about that.

23 THE WITNESS: I am not sure.

24 (Record read.)

25 MR. McDONALD: Q. So you did not have to get  
0082

1 approval of your superior for the decision as to what

2 processes would be developed for the LISC?

3 A. No.

4 Q. And I think one of your earlier answers made  
5 reference to the group that we talked about earlier, you,  
6 Mr. Torretta and Mr. Hough, making recommendations, and  
7 there would be another group, I thought you testified,  
8 that made ultimate decisions; is that right?

9 A. Well, you asked me about -- and that's why I  
10 answered those two questions about process development,

11 what gets developed and how it gets developed, and that's  
12 my responsibility and the responsibility of the members of  
13 my team.

14 So when we talked about process development  
15 earlier, we talked about priorities and the different  
16 things that go into prioritizing, the process development  
17 effort. So, you know, within that context, I am  
18 responsible for business process development and the  
19 development of Methods and Procedures, and so I see myself  
20 as, you know, prioritizing based on input from systems,  
21 from the LISC, based on inputs regarding volume, issues,  
22 all of that.

23 Q. Well, in '95, when you took on the job and  
24 throughout the period when you were doing the planning,  
25 who was your immediate superior, who did you report to?  
0083

1 A. Carol Spain, S-p-a-i-n.

2 Q. Do you know what her title is, or was?

3 A. Executive director.

4 Q. Of what group?

5 A. Industry market, product management for resale  
6 and local interconnection, and my organization was part of  
7 the product management organization at that time.

8 Q. Did you consult with her on a regular basis as  
9 to your activities in the planning for the LISC?

10 A. No, not really.

11 Q. I think you already testified you were the one  
12 who ultimately made the determination about what processes

13 would be developed for the LISC?

14 A. Yes.

15 Q. Now, when you were developing those processes,  
16 the processes, I think you already testified, depend upon  
17 what systems are going to be implemented; is that not  
18 correct?

19 A. Well, there is an inter-dependency there between  
20 systems and process, in that you establish a process with  
21 the systems in mind, in terms of what the fit is within  
22 that process, and then you modify the process. As the  
23 systems change or as the new systems come into the  
24 picture, you modify the process to see, you know, what's  
25 the fit of those few systems within that process.

0084

1 Q. In the planning for the LISC, were the processes  
2 dependent upon the systems that were going to be  
3 available, or did you devise certain processes and then  
4 call upon systems people to develop the systems to fit  
5 within those processes?

6 A. I would say both of those conditions existed.

7 Q. Can you give me examples of each of those?

8 A. Well, in the initial phases of business process  
9 development, from a purely business process perspective,  
10 you are looking at it from the perspective of how are we  
11 going to do business and how is this process going to  
12 work.

13 Somewhat not taking systems into account, you  
14 are looking at it from a higher level, a flow of  
15 information level, what type of information needs to be

16 exchanged between customer, company, work groups and  
17 downstream systems that already exist.

18       Then, as you move through the cycle, you look to  
19 see what are your business requirements for systems, and  
20 that's when you start to identify those areas of this  
21 business process that you have kind of mapped out, those  
22 areas of the business process that require further  
23 development in terms of systems support, and identify  
24 those areas to say that, okay, here is where I need  
25 additional mechanization or systems support, and so it's  
0085  
1 part of a developmental cycle, essentially.

2     Q. When you are doing that analysis, do you factor  
3 in personnel, whether quality or quantity?

4     A. Not necessarily in terms of business process  
5 itself, but in terms of the systems development, yes.

6     Q. So it would be true if you anticipate

16 exchanged between customer, company, work groups and  
17 downstream systems that already exist.

18       Then, as you move through the cycle, you look to  
19 see what are your business requirements for systems, and  
20 that's when you start to identify those areas of this  
21 business process that you have kind of mapped out, those  
22 areas of the business process that require further  
23 development in terms of systems support, and identify  
24 those areas to say that, okay, here is where I need  
25 additional mechanization or systems support, and so it's  
0085  
1 part of a developmental cycle, essentially.

2     Q. When you are doing that analysis, do you factor  
3 in personnel, whether quality or quantity?

4     A. Not necessarily in terms of business process  
5 itself, but in terms of the systems development, yes.

6     Q. So it would be true if you anticipated, you  
7 know, having only five people to operate the LISC, that  
8 that would call for a very mechanized system which would  
9 demand that there be a certain type of process which would  
10 be dramatically different from, say, a LISC where you  
11 anticipated having 200 people working with systems  
12 appropriate to that many people?

13    A. Yeah. I have a little problem with the example  
14 that you have given, but essentially, yeah, you look to  
15 see, you know, what does the process look like, what's the  
16 time and motion associated with that process or with the  
17 LISC's piece of that end-to-end process, and the functions



18 within the LISC and, essentially, make a determination as  
19 to what systems capabilities am I going to have, when am I  
20 going to have them, and that's certainly all input then  
21 into the staffing requirements associated with the service  
22 center.

23 Q. When you were devising the appropriate  
24 processes, did you consider staffing?

25 A. Yes.

0086

1 Q. And what information did you have about  
2 staffing?

3 A. We had the forecast information.

4 Q. And the forecast told you -- and that's forecast  
5 information that Laura Scherer prepared?

6 A. Yes.

7 Q. And what that told you was the expected number  
8 of lines that were to be migrated over periods of time?

9 A. It was a combination of different activities.  
10 It told us what we can expect to see in terms of volume of  
11 resale services, and a pick, so to speak, on when we could  
12 expect to see those volumes. And as I mentioned earlier,  
13 the pick, in terms of when it necessarily coincided with  
14 what the forecast indicated.

15 Q. When you say pick, you mean p-i-c-k?

16 A. Right.

17 Q. It's a selection, essentially?

18 A. Yes, a selection.

19 Q. So let me see if I understand. When you and the  
20 other two individuals were trying to plan for the LISC,

21 you had in mind what the forecast resale order volume

22 might be; is that right?

23 A. Yes.

24 Q. And when you were planning for the LISC, did you

25 have it as a goal that you would establish the LISC with  
0087

1 adequate personnel systems around processes to be able to

2 handle the number of orders that were forecasted?

3 A. Yes.

4 Q. At any point, did you or anyone on the team that

5 was involved in planning undertake an investigation to see

6 how the LISC's operations progressed in actuality as

7 compared with how you anticipated in your planning?

8 MR. KOLTO-WININGER: That you are aware of.

9 THE WITNESS: Yes.

10 MR. McDONALD: Q. And can you describe what

11 that was?

12 A. Go back to the previous question. Give me a

13 little more.

14 Q. Was there any attempt to do a comparison between

15 the LISC actual production, actual productivity, actual

16 results versus the anticipated forecasts, the planned LISC

17 function?

18 A. Okay. Yeah, essentially, when you are looking

19 at a planning cycle or a development cycle where you don't

20 have much in the way of data to go on, you make some broad

21 assumptions as to what you think it would take to put a

22 process in place, how much time that process is going to

23 take, what kind of capacity that process consists of,

24 those things types of things.

25 Then, as you move into the operational phase,

0088

1 you are hit with reality, which sometimes doesn't look

2 like the planning phase, in that you run into things.

3 Because, again, all of these processes are new, and the

4 products and services are new, and many of the personnel

5 on the LISC are new.

6 So some of the assumptions that you have used in

7 the planning phase may not read out well in the actual

8 implementation or operational phase. So I guess, in

9 answer to your question, you are constantly looking at

10 that and adjusting it based on the reality at the moment.

11 Q. Okay. Were you involved in any exercise like

12 that?

13 A. Yes.

14 Q. And when did you do that?

15 A. I would say probably in -- just before I kind of

16 let go of the planning responsibilities, in probably about

17 September of '96 or -- I want to say '95.

18 Q. I think your earlier testimony was that the

19 planning occurred --

20 A. Yeah, September of '95, yeah.

21 Q. Well, in September of '95, had the LISC received

22 any substantial resale orders?

23 A. No.

24 Q. So how are you able to test reality versus the

25 planning?

0089

1 A. Okay. I understand. It's an ongoing process.  
2 You know, the fact that I was no longer directly involved  
3 with this planning phase doesn't mean that the  
4 reevaluation of the requirements of the LISC, in terms of  
5 processes and staffing, stopped at that point. That  
6 continues and it continues on today, as you gather more  
7 intelligence about the nature of this new market and the  
8 issues associated with these new processes, so it's  
9 ongoing, I guess, is what I am saying.

10 Q. Let's go back to the planning process.

11 Off the record.

12 (Discussion off the record.)

13 MR. McDONALD: Q. If I can show you something  
14 that's been marked Exhibit 11, without going into the  
15 numbers, is that document familiar to you?

16 A. No, actually, it's not.

17 Q. Did you see another document that provided you  
18 forecast information when you were in the planning  
19 function for the LISC?

20 A. Yes.

21 Q. Do you remember when it was you saw that  
22 document?

23 A. I have seen forecasts on the local competition  
24 initiative since probably mid-year 1995.

25 Q. And do you know if the aggregate number that's  
0090

1 shown in total on Exhibit 11, if that conforms to a number  
2 that you were working from when you did your planning for

3 the LISC?

4 A. Well, the number changed over time. I couldn't  
5 say for sure in all honesty.

6 Q. Do you have any recollection of what -- let me  
7 back up. Did you see another document that looked like  
8 this in your planning?

9 A. Not exactly like this, no.

10 Q. And were the forecast documents that you saw,  
11 were they intended to present a forecast of the resale  
12 access lines that would be migrated for specific periods  
13 of time?

14 MR. KOLTO-WININGER: Objection. Calls for  
15 speculation; lacks foundation as to what it was intended  
16 to show. But go ahead, explain your understanding.

17 THE WITNESS: Okay. My understanding is that  
18 the forecasts that I have seen, and there have been  
19 different durations of them, essentially represented  
20 number of resale access lines, number of unbundled network  
21 elements, I mean, you know, all of the local competition  
22 products and initiatives were reflected on that forecast.  
23 It's one of the reasons why I say this looks very  
24 different from what I have seen.

25 MR. McDONALD: Q. But that forecast, what  
0091  
1 you -- let me back up.

2 How many different forecasts did you work from,  
3 to your recollection, in 1995?

4 A. There were probably -- in 1995, there were  
5 probably two, two or three and --

6 Q. And do you know if there was a trend? Was there  
7 an initial forecast number that was higher than the  
8 subsequent one or two forecasts, you know, did it drop as  
9 time went on?

10 A. I don't recollect any significant increase or  
11 drop. There may have been changes in the mix of products.

12 Q. So, for example, what's marked Exhibit 11 has it  
13 broken down resale access lines, broken down by consumer,  
14 basic business, Centrex, and PBX trunks? Is that the same  
15 kind of business that you saw in these forecasts that you  
16 are testifying about?

17 A. Yeah. Initially, there was not the breakdown of  
18 Centrex and PBX because Centrex and PBX weren't addressed  
19 by the commission, so -- until much later. So the early  
20 forecasts were largely around basic exchange services.

21 Q. So when you were doing your planning, you were  
22 looking at a forecast that -- you tell me, did it give you  
23 a total year-end volume, such as what's shown on Exhibit  
24 11?

25 A. Yes.  
0092

1 Q. Did you ever see a forecast that looks like, for  
2 example, what's shown on Exhibit 12, where it's broken  
3 down by month?

4 A. Yes.

5 Q. Do you know when you first saw one of those  
6 forecasts?

7 A. With this particular product mix, not until late

8 '96, but again, the Commission's order did not address

9 many of these products until late '96 or -- yeah, late

10 '95. Late '95. I will try to keep my years straight.

11 MR. ETTINGER: Can we go off the record?

12 (Discussion off the record.)

13 MR. McDONALD: Q. You want to go back on the

14 record and correct that one answer?

15 A. Yeah.

16 Q. That is that you now believe you saw forecasts

17 in late '95 rather than late '96; is that correct?

18 A. Yes, but not with this product mix.

19 Q. Have you seen Exhibit 12 before?

20 A. Not as displayed here.

21 Q. How does it differ from what you previously saw?

22 A. The product mix is different.

23 Q. What's different about this product mix?

24 A. Generally, the forecasts that I have seen have

25 included basic business, basic residence, Centrex, PBX, it  
0093

1 might have included ISDN. I don't know that I have ever

2 seen one with ACN.

3 Q. Do you know if -- in the planning process that

4 you engaged in in 1995, did you and Mr. Torretta and

5 Mr. Hough -- did all three of you work with forecast

6 information?

7 A. I can't speak for Mr. Torretta. I worked

8 largely with Mr. Hough with forecasting information.

9 Q. And did you and he work with the same

10 information, to your knowledge?

11 A. Yeah. Generally, Robert had the information.

12 Q. Did he provide it to you?

13 A. Uhm-hum.

14 Q. And did you use the forecast information, along  
15 with your expectation for the amount of time that would be  
16 required to perform each of the various functions, to  
17 assist in determining how many individuals would have to  
18 be hired to work at the LISC?

19 A. Yes.

20 Q. And how did you go about doing that?

21 A. We looked at task times, and essentially,  
22 calculated, based on task times, what the resource  
23 requirements for the LISC would be.

24 Q. During the planning process in 1995, did you  
25 reach a conclusion as to how many orders per day the  
0094  
1 average LISC employee could handle?

2 A. I am sure we did, but I don't remember what the  
3 number is.

4 Q. And have you looked at that issue since 1995, in  
5 terms of the orders processed per day?

6 A. I am sure I have looked at it during 1996 but  
7 under what circumstances, I couldn't tell you for sure.

8 Q. Well, you are aware of how the LISC operated in  
9 the fourth quarter of 1996, right?

10 MR. KOLTO-WININGER: Objection. Vague. Go  
11 ahead.

12 MR. McDONALD: Q. You can answer.



13 A. In what sense?

14 Q. Well, I think you already testified about the  
15 existence of a backlog in December, you already testified  
16 about delayed issuance of FOC's and delayed issuance of  
17 completion notices, right?

18 A. Right.

19 Q. And you also talked about provisioning problems?

20 A. Correct.

21 Q. Do any of those relate to the LISC operations?

22 A. Oh, yes.

23 Q. So you do have familiarity with the LISC  
24 operations, fourth quarter 1996, correct?

25 A. Yes.

0095

1 Q. Now, to your mind, were those operations  
2 consistent with the planning that you undertook in 1995?

3 A. Not entirely, no.

4 Q. Where did it deviate from the planning?

5 A. I would say that it primarily deviated in the  
6 number of people that we expected to see in the LISC, and  
7 largely in the expertise level that we had hoped to  
8 acquire, as well as the level of mechanization that we had  
9 hoped to have at that time frame.

10 Q. Now, in terms of the number of people, that was  
11 something that you did control, right?

12 A. No.

13 Q. You had input at some level, did you not?

14 A. Correct.

15 Q. And by the fall of '96, did you have input on